

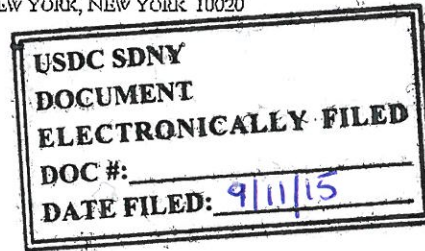
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September 11, 2015

Via Facsimile (212) 857-2346

The Honorable Denny Chin
 United States Circuit Judge
 United States Courthouse
 40 Foley Square
 New York, NY 10007-1502

Re: Sykes, et al. v. Mel S. Harris and Associates LLC, et al., 09 Civ. 8486 (DC)

Dear Judge Chin:

This firm, along with co-counsel MFY Legal Services and the New Economy Project, represents Plaintiffs and the Class in the above-referenced action. We write to respectfully request an adjournment of today's deadline to file a motion for preliminary approval of the settlement with the Leucadia Defendants. This adjournment is sought because, earlier today, Judge Ellis provided a mediator's proposal as to the monetary component of the settlement with the Samserv Defendants and, separately, the Mel Harris Defendants; Judge Ellis required the parties to respond privately to him by Thursday, September 17, at 4 p.m. Judge Ellis's proposal, if accepted as to either set of Defendants, could lead to an expansion of the settlement agreement for which we would be seeking the Court's preliminary approval. Accordingly, we propose that we provide the Court a status report next Friday, September 18, as to the status of settlement as to both sets of Defendants and propose a motion schedule at that time. The Leucadia Defendants consent to this adjournment request.

We thank the Court for its consideration of these matters and are available should the Court have any questions or concerns.

Sincerely,


 Debra L. Greenberger

c. All Counsel of Record, via email

9-11-15
 Approved
 SO ORDERED.


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